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26 Attorneys for Defendant  
27 DOLLAR TREE STORES, INC.

28 UNITED STATES DISTRICT COURT  
1 NORTHERN DISTRICT OF CALIFORNIA

2 MIGUEL A. CRUZ, and JOHN D. HANSEN,  
3 individually and on behalf of all others  
4 similarly situated,

5 Plaintiffs,

6 v.  
7 DOLLAR TREE STORES, INC.,  
8 Defendant.

CASE NO. C 07 2050 SC (ENE) and  
CASE NO. C 07 04012 SC

**STIPULATION AND [PROPOSED]  
ORDER REMOVING CASES FROM  
ENE OR EXTENDING DEADLINE  
TO HOLD AN ENE SESSION**

1 ROBERT RUNNINGS individually, and on  
2 behalf of all others similarly situated,

3 Plaintiff,

4 v.  
5 DOLLAR TREE STORES, INC.,  
6 Defendant.

JUDGE: Hon. Samuel Conti  
COMPLAINTS FILED: April 11, 2007  
July 6, 2007  
TRIAL DATES: No dates set.

1 The parties hereby request an extension of the deadline to hold the ENE  
2 session and a corresponding continuation of the pre-session telephone conference as  
3 the Court is currently considering the Motions for Summary Judgment filed by the  
4 defendant against Plaintiffs John Hansen and Robert Runnings. As the ruling upon such  
5 motions is likely to have significant impact upon the parties' view of their respective  
6 cases, it is difficult for the parties to prepare for an ENE session without the benefit of  
7 such ruling.

As a result the parties do not believe a session at this time will be productive.

10 The parties therefore jointly request that these cases be removed from the  
11 ENE program, and that the possibility of ADR be addressed in the future when these  
12 cases are more fully developed. In the alternative the parties request that the deadline  
13 to hold the ENE session be extended to September 1, 2008, and that the pre-session  
14 telephone conference set for April 14, 2008 be correspondingly postponed.

15 It is so stipulated.

DATED: April 7, 2008

KALIFF MCCLAIR & MCGUIRE LLP

18 By: /s/Alexander Hernaez  
19 ALEXANDER HERNAEZ  
20 Attorneys for Defendant  
DOLLAR TREE STORES, INC.

21 DATED: April 7, 2008

SCOTT COLE & ASSOCIATES, APC

23 By: /s/Carrie S. Lin  
24 CARRIE S. LIN  
25 Attorneys for Plaintiff  
ROBERT RUNNINGS

1 DATED: April 7, 2008

EDGAR LAW FIRM

2 By: /s/ Jeremy R. Fietz

3 Jeremy R. Fietz

4 Attorneys for Plaintiffs MIGUEL A.  
5 CRUZ and JOHN D. HANSEN

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED that  
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3 These cases be removed from the ENE program, and that the possibility of ADR be  
4 addressed in the future when these cases are more fully developed.

5 or

6 [The deadline to hold the ENE session be extended to September 1, 2008, and that the  
7 pre-session telephone conference set for April 14, 2008 be correspondingly postponed.]  
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9 DATED: 4/8/08, 2008

10   
11 Samuel Conti, United States District  
12 Court Judge

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